

September 16, 1999

Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter of:
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service
Docket No. MM-99-25

To: Federal Communications Commission

Comments of Richard L. Walen

I am writing the Commission for their support of Docket No. MM 99-25 for the creation of Low Power FM broadcast service for small communities. Allowing low power broadcaster to serve their communities with a new variety of programming. These kind of stations would strengthen their communities which are too small to get the attention of "mainstream" ratings driven media.

LPFM must allow for commercially supported as well as non-commercially supported stations.

Both the 2nd and 3rd adjacent channel restrictions must be dropped for LPFM stations. Improvements in receiver design since the rules were written decades ago will allow these restrictions to be dropped. FACT: hundreds of full power (grandfathered short-spaced) FM stations have been operating on 2nd and 3rd adjacent channels for several years with no interference problems.

Perferably the FCC will use a "prohibited contour overlap" method of predicting interference. This would allow for many more LPFM stations to be created nationwide and would make the use of standard "directional patterns" feasible.

Class LP-1000 stations should be allowed an antenna height of 100 meters (328 feet). This would provide for an additional $2\frac{3}{4}$ miles of coverage without requiring any additional power. Distance to 60 dBu contour would increase from 8.8 miles to 11.76, which could help LPFM stations reach significantly more people and therefore enhance their ability to survive.

LPFM must not be subjected to a narrower bandwidth than full power FM stations since audio quality could suffer. We do support dropping sub-carriers other than stereo however to prevent interference.

There should be a form of ownership restrictions to keep this service for "local owners" so as not to be snapped up by large corporate broadcasters. My view is the owner should live within the broadcast coverage area of his/her proposed station. (For a LP-1000 station with a HAAT of 328 feet they should live within the 11.76 miles of the stations broadcast area)

The applications should be on a first come, first served basis and not done by auctions. If auctions must be done then there must be substantial bidding credits available to small business applicants that would allow them to compete with applicants with large financial resources.

Class LP-1000 stations should include stations from 1000 watts down to 200 watts as long as engineering showing proves no interference using the "prohibited contour overlap" method. These stations should be "primary status" and protected to their 1 mV/m (60 dBu) contour.

Respectfully submitted:

Richard L. Walen
Zumbrota, Minnesota